

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



Office of Pesticide Programs

MEMORANDUM

11/7/2017

SUBJECT: Product Chemistry Review for **Whip** EPA Reg. No.: **5813-RRL**

FROM: Joseph Williams Jr.

Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

THRU: Karen P. Hicks, Team Leader

Chemistry and Toxicology Team
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TO: Eric Miederhoff, PM Team 31 / Tara Flint
Regulatory Management Branch I
Antimicrobials Division (7510P)

Registrant: The Clorox Co.

Action code: A540

Agency Due Date:
12/20/2017

DP No.: 441885

Submission No.: 1005745

E-Sub No.: 20735

Classification: EP

Process: Nonintegrated
system

Pesticide type:
Disinfectant

MRID(s):50148201, 50148202, 49798901

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
069105	68424-85-1	n-Alkyl (50% C ₁₄ , 40% C ₁₂ , 10% C ₁₆) dimethyl benzyl ammonium chloride	0.13000
069149	7173-51-5	Didecyl dimethyl ammonium chloride	0.04875
069165	32426-11-2	Octyl decyl dimethyl ammonium chloride	0.09750
069166	5538-94-3	Diocetyl dimethyl ammonium chloride	0.04875
		Other Ingredients	99.67500
		Total	100%

I. BACKGROUND

The Registrant, The Clorox Co., has submitted an application for pesticide registration for their product: Whip EPA Reg. No. 5813-RRL.

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-27 – Formulator’s Exemption Statement	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-35 – Data Matrix (6/29/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cover letter (6/29/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed CSF BASIC, (8/16/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed CSF ALTERNATE 1, (8/16/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label, (10/30/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments:		

III. FINDINGS

a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use		
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Active Ingredients(s)			Nominal	Upper limit	Lower limit		
n-Alkyl (50% C ₁₄ , 40% C ₁₂ , 10% C ₁₆) dimethyl benzyl ammonium chloride			0.13	0.143	0.117		
Didecyl dimethyl ammonium chloride			0.04875	0.05	0.0439		
Octyl decyl dimethyl ammonium chloride			0.0975	0.107	0.0878		
Diocetyl dimethyl ammonium chloride			0.04875	0.05	0.0439		
			YES	NO	N/A		
1. The certified limits of all ingredients are within 40 CFR standard certified limits.			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
2. Wider certified limits were requested and rationale was accepted.			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
3. The nominal concentration(s) of the active ingredient is in agreement with the label.			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
5. All inert ingredients are approved for non-food use pesticide formulations.			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
6. The impurities present >0.1% are identified.			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
7. Impurities of toxicological significance have an upper certified limit.			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		

b. Product Label:

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. If yes to 1-5, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IV. Conclusion

The Product Science Branch of Antimicrobials Division finds the proposed CSFs for the Basic Formulation and Alternate Formulation #1, dated 8/16/2017 **acceptable**. The OCSPP Guidelines 830 Series for Group A and B chemistry data for *Whip* EPA Reg. No. 5813-RRL are **acceptable**.

V. Table A:**Series 830 guidelines – Group A**

OPPTS#	Name	Status	MRID
830.1550	Product Identity & Composition	Acceptable	50148201
830.1600	Description of materials	Acceptable	50148201
830.1620	Description of production process	Not required	50148202
830.1650	Description of formulation process	Acceptable	50148201
830.1670	Discussion of formation of impurities	Not required	50148201
830.1700	Preliminary analysis	Not required	50148202
830.1750	Certified limits	Acceptable	50148201
830.1800	Enforcement analytical method	Acceptable	49798901
830.1900	Submittal of samples	Acceptable	50148202

VI. Table B: Series 830 guidelines – Group B

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6302	Color	Colorless	Acceptable	50148201
830.6303	Physical state	Clear Liquid	Acceptable	50148201
830.6304	Odor	Fruity	Acceptable	50148201
830.6313	Stability to normal & elevated temperatures, metals & metal ions	The product is not TGA	Not applicable	50148202
830.6314	Oxidation/Reduction	No oxidizer/reducer present	Waived	50148202
830.6315	Flammability	>93 deg C	Acceptable	50148201
830.6316	Explodability	Product does not contain explosive ingredients	Waived	50148202
830.6317	Storage stability	The study is in progress	In progress	50148202
830.6319	Miscibility	Product not mixed with organic solvents	Waived	50148202
830.6320	Corrosion characteristics	The study is in progress	In progress	50148202
830.6321	Dielectric breakdown voltage	Product not used near electrical equipment	Waived	50148202
830.7000	pH	9.72 at 25 deg C	Acceptable	50148201
830.7050	UV/Visible absorption	Not required for EP	Not applicable	50148202
830.7100	Viscosity	1.22 cP at 20 deg C and 0.84 cP at 40 deg C	Acceptable	50148201
830.7200	Melting point	Not required for EP	Not applicable	50148202
830.7220	Boiling point	Not required for EP	Not applicable	50148202
830.7300	Density/relative	1.032 g/mL at 21.3 deg C	Acceptable	50148201
830.7370	Dissociation constants in water	Not required for EP	Not applicable	50148202
830.7520	Particle size	Not required for EP	Not applicable	50148202
830.7550/ 7560/ 7570	Partition coefficient	Not required for EP	Not applicable	50148202

830.7840/ 7860	Water solubility	Not required for EP	Not applicable	50148202
830.7950	Vapor pressure	Not required for EP	Not applicable	50148202

